

DRAFT – List of States for Review

The initial “Scope of Work” from ADEC included the following list of States to evaluate: CO, AZ, UT, NV, MT, TX, OK, OR, MN, and two or more of Washington State’s local clean air agencies. However, the contractor is allowed the discretion to select other States or local agencies to evaluate for innovative programs. RTP conducted a preliminary review of the listed State/local agencies, as well as several other States with which we have experience, to determine if a State should be included.

RTP used the following criteria for determining if a State’s minor source program warranted further review:

- Streamlining options, especially for source categories of concern for AK:
 - Permits-by-rule; and/or
 - General permits;
- Administrative procedures, such as de minimis exemptions or other types of exemptions/registration;
- Similar source types and land use as Alaska; and
- Methods used to address attainment with NAAQS and increments.

RTP proposes to include the following States in our review. The reasons for inclusion are specified.

AZ – similar source types; requires modeling for minor sources; combined construction/operating permit with specific compliance requirements

CO – de minimis levels for permitting and registrations; self-certification procedures

MN – streamlining efforts – Registration Permits

MS – general permit for asphalt, including notice by applicant up front; streamlining exemptions, e.g., when only a change to the Title V permit is required

NC – optional construction registration with more formal application follow-up

NJ – general permits (combustion sources, soil remediation for gasoline), including on-line applications; State-of-the-Art requirements; incinerator rule

NM – general permits for asphalt; quarrying, crushing, and screening; and oil and gas

OK – permit by rule (PM emissions); general permits for asphalt and non-metallic mineral processing (including IC engines); allowable emission limits for incinerators; de minimis threshold

OR- several types of permits including “basic,” “general,” and “simple,” for different source categories and sizes (e.g., rock crushing < 5000 tpy, between 5000 and 25,000 tpy, > 25,000 tpy); “simple” is for plant-wide emission limits 1 tpy less than significant emission rates

SC – modeling required for minor sources, although some streamlining procedures are included; list of standard monitoring conditions that are applied to non-Title V/NSR permits; also conducting streamlining effort for construction/operating permit program

TX – permit-by-rule and standard permits for source categories of interest, including oil and gas, rock crushing, hot mix asphalt and other asphalt-related sources, combustion sources, and soil remediation

UT – interesting list of exemptions, including small source (de minimis emissions), flexibility changes, replacement-in-kind equipment, and de minimis emissions for soil remediation projects

Several States/local agencies from the original list were replaced. While the individual States/local agency may have one component of the criteria (e.g., de minimis thresholds or exemptions), there were other States with more streamlining procedures or “innovative” programs.